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 ALI EBRAHIMZADEH

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

IRANIAN AMERICANS FOR
 LIBERTY INSTITUTE,

Plaintiff,

vs.

ALI EBRAHIMZADEH, et al.,

Defendants.

) Case No.: 2:22-CV-09240

) **EVIDENTIARY OBJECTIONS IN**
) **SUPPORT OF SPECIAL MOTION**
) **TO STRIKE**

) Date: March 6, 2023

) Time: 10:00 a.m.

) Location: Courtroom 5A

Defendant Ali Ebrahimzadeh hereby objects to the following evidence
 filed by Plaintiff in opposition Defendant's special motion to strike and further
 requests that the below described evidence be excluded from evidence on the
 grounds set forth below:





1	Material Objected To	Grounds for Objection	Ruling
2	<u>Objection No. 1.</u>	1. Hearsay.	
3	<u>Dkt. 20-1: Declaration of Daniel</u>	Fed. R. Evid. 801.	
4	<u>Jafari (“Jafari Decl.”), Pg. 3, ¶ 27:</u>	2. Lacks foundation. Fed.	SUSTAINED
5	A member of IAL visited	R. Evid. 901.	
6	Ebrahimzadeh’s Prior Twitter		OVERRULED
7	Profile and took screenshots of		
8	Ebrahimzadeh’s tweets on		
9	December 25, 2021, and then		
10	pasted the screenshots of the		
11	tweets as images into a Microsoft		
12	Word document. A true and		
13	correct copy of Ebrahimzadeh’s		
14	tweets as pasted into the		
15	Microsoft Word document is		
16	attached hereto as Exhibit C (the		
17	“Tweets”). Exhibit C reflects true		
18	and accurate copies of the tweets		
19	that I viewed on Ebrahimzadeh’s		
20	Prior Twitter Profile.		
21	<u>Objection No. 2.</u>	1. Calls for speculation.	
22	<u>Jafari Decl., Pg. 4, ¶ 32:</u>	Fed. R. Evid. 701.	
23	It is my opinion that	2. Hearsay.	SUSTAINED
24	Ebrahimzadeh’s Tweets were	Fed. R. Evid. 801.	
25	likely the result of either	3. Lacks foundation. Fed.	OVERRULED
26	collusion between Ebrahimzadeh	R. Evid. 901.	
27	and Alinejad, or the result of		
28	Alinejad encouraging		

1	Material Objected To	Grounds for Objection	Ruling
2	Ebrahimzadeh to post the		
3	Tweets. My opinion is based on		
4	the fact that Ebrahimzadeh		
5	published the Tweets one day		
6	after IAL issued IAL's December		
7	24 Statement, which heavily		
8	criticized Alinejad, and because		
9	IAL and Alinejad have publicly		
10	disagreed on sensitive issues in		
11	the past.		
12	<u>Objection No. 3.</u>	1. Hearsay.	
13	<u>Jafari Decl., Pg. 4, ¶ 34:</u>	Fed. R. Evid. 801.	<hr/> SUSTAINED
14	Immediately after Ebrahimzadeh		
15	published his Tweets, members of		
16	IAL received repeated inquiries		<hr/> OVERRULED
17	about Ebrahimzadeh's Tweets,		
18	including several that assumed		
19	the Tweets were true.		
20	<u>Objection No. 4.</u>	1. Calls for speculation.	
21	<u>Jafari Decl., Pg. 6, ¶ 46:</u>	Fed. R. Evid. 701.	<hr/> SUSTAINED
22	Based on my experience, the vast	2. Lacks foundation. Fed.	
23	majority of the Iranian-American	R. Evid. 901.	
24	community are familiar with		<hr/> OVERRULED
25	NIAC and the public accusations		
26	that NIAC lobbies for the Iranian		
27	regime.		
28			





1	Material Objected To	Grounds for Objection	Ruling
2	<u>Objection No. 5.</u>	1. Calls for speculation.	
3	<u>Jafari Decl., Pg. 7, ¶ 54:</u>	Fed. R. Evid. 701.	
4	Based on my experience	2. Lacks foundation.	SUSTAINED
5	advocating for the Iranian-	Fed. R. Evid. 901.	
6	American community and my		
7	own experience as an Iranian		OVERRULED
8	American opposing the Iranian		
9	regime, I understand that the		
10	Iranian-American community		
11	takes very seriously any		
12	statement linking a person or		
13	organization to the Iranian		
14	regime or any statement that a		
15	person or organization lobbies or		
16	advocates on behalf of the Iranian		
17	regime.		
18	<u>Objection No. 6.</u>	1. Calls for speculation.	
19	<u>Jafari Decl., Pg. 7, ¶ 59:</u>	Fed. R. Evid. 701.	
20	I have read many comments to	2. Hearsay.	SUSTAINED
21	Ebrahimzadeh's Twitter posts	Fed. R. Evid. 801.	
22	and I understand that people	3. Lacks foundation.	
23	take Ebrahimzadeh's tweets	Fed. R. Evid. 901.	OVERRULED
24	seriously, especially many		
25	Iranian-Americans.		
26			
27			
28			

Material Objected To	Grounds for Objection	Ruling
<u>Objection No. 7.</u> <u>Jafari Decl., Pg. 8, ¶ 62:</u> IAL received numerous inquiries about Ebrahimzadeh's Tweets, including several that assumed the Tweets were true.	1. Hearsay. Fed. R. Evid. 801. 2. Lacks foundation. Fed. R. Evid. 901.	<hr/> SUSTAINED <hr/> OVERRULED
<u>Objection No. 8.</u> <u>Jafari Decl., Pg. 8, ¶ 63:</u> Such inquiries and the negative publicity created by Ebrahimzadeh's tweets immediately placed significant pressure on IAL as an organization, and its members faced harsh criticism for being accused of supporting the Iranian regime.	1. Calls for speculation. Fed. R. Evid. 701. 2. Lacks foundation re causation. Fed. R. Evid. 901.	<hr/> SUSTAINED <hr/> OVERRULED

DATED: February 27, 2023

JEFF LEWIS LAW, APC

By: /s/ Jeffrey Lewis

Jeffrey Lewis

Sean C. Rotstan

Attorneys for Defendant

ALI EBRAHIMZADEH

